

**THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

Taylor D. Pendleton,

Plaintiff,

v.

10Q LLC *et al.*,

Defendants.

Case No. 1:23-cv-04708

Dist. Judge Andrea R. Wood

Mag. Judge M. David Weisman

DECLARATION OF JOSH S. KAPLAN

I, Josh S. Kaplan, of the City of Chicago, in the State of Illinois, declare as follows:

1. I am an attorney admitted to practice before all Illinois state courts. I am in good standing with all of those courts and have never been subject to professional disciplinary proceedings of any kind.

2. This Declaration is submitted to supplement the Motion to Vacate Entry of Default filed by Defendants Propelr Music, LLC (“Propelr”) and Marriani, Inc. (“Marriani”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the assertions contained in this Declaration.

3. I am the sole owner and sole manager of Propelr.

4. I am the registered agent for both Propelr and Marriani.

5. Prior to February 2023, I was a partner in the law firm Troglia Kaplan, LLC, the principal office of which is 1525 North Elston Avenue, Suite 200, Chicago, Illinois 60642.

6. Troglia Kaplan is a separate business from Propelr and Marriani.

7. Since February 2023, I have been serving in an of counsel capacity to Troglia Kaplan but I have not been servicing clients in order to work primarily as a music manager.

8. I am a music manager for several artists, including Doja Cat. Due to her national tour which occurred between October 31, 2023, through December 13, 2023, I was not present at the registered address of 1525 North Elston Avenue, Suite 200, Chicago, Illinois 60642 on any of the dates on which Plaintiff's process server allegedly came to the address to serve process on Propelr, Marriani, or Antoine Reed.

9. Other than serving as the registered agent of Marriani, I do not hold any ownership stake or decision-making authority in Marriani.

10. In my capacity as manager of Propelr, my prior communications with respect to Plaintiff's allegations have been through Propelr's counsel in the Central District of California for Case No. 2:22-cv-04806-RGK-PVC. I have not at any point been contacted directly regarding any attempts to serve either Propelr or Marriani.

11. I have not at any point sought to cause Propelr, Marriani, or Antoine Reed to evade service in either of the actions filed by Plaintiff against Propelr, Marriani, and Antoine Reed.

12. To my knowledge, Antoine Reed (in his individual capacity and in his capacity as the decision-maker of Marriani) was not aware that Plaintiff was attempting to effect service upon him with respect to this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on June 28, 2024, at Chicago, Illinois.

/s/ Josh S. Kaplan
Josh S. Kaplan